



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

March 23, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: Dexter Axle Company / F113-17172-00008

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot 9/16/03



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## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Dexter Axle Company  
500 South Seventh Street  
Albion, Indiana 46701**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 113-17172-00008	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 23, 2004  Expiration Date: March 23, 2009

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary motor vehicle parts and accessories manufacturing source.

Authorized Individual: Facility Manager  
Source Address: 500 South Seventh Street, Albion, Indiana 46701  
Mailing Address: P.O. Box 108, Albion, Indiana 46701  
General Source Phone: 260-636-2195  
SIC Code: 3714  
Source Location Status: Noble County  
Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, capacity: 2,034 brake shoes per hour.
- (b) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, capacity: 923 metal backing plates per hour.
- (c) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with eleven (11) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, capacity: 429 metal brake parts per hour.
- (d) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with four (4) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 12, capacity: 429 metal brake parts per hour.
- (e) One (1) grinding system constructed in 1975, identified as EU-14, equipped with six (6) grinders and a HEPA filtration system, identified as CE-14, for particulate control, exhausting to Stack 14, capacity: 1,800 pounds of friction material per hour.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Source-wide natural gas-fired combustion, rated at 34.62 million British thermal units per hour total, consisting of the following:



- (1) Three (3) air makeup units, heat input capacity: 5.00 million British thermal units per hour each;
  - (2) Eight (8) heaters / air conditioners, heat input capacity: 0.475 million British thermal units per hour each;
  - (3) Twenty-five (25) natural gas-fired space heaters, heat input capacity: 0.150 million British thermal units per hour each;
  - (4) Three (3) bonders, heat input capacity: 0.800 million British thermal units per hour each;
  - (5) Three (3) parts washers, heat input capacity: 0.650 million British thermal units per hour each;
  - (6) One (1) parts washer, heat input capacity: 0.880 million British thermal units per hour;
  - (7) One (1) parts washer, heat input capacity: 1.80 million British thermal units per hour;
  - (8) One (1) parts washer, heat input capacity: 4.80 million British thermal units per hour; and
  - (9) Three (3) office furnaces, heat input capacity: 0.080 million British thermal units per hour each.
- (b) Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, capacity: 6.00 pounds of welding wire per hour each.
- (c) Paved and unpaved roads and parking lots with public access.
- (d) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:
- One (1) bullard system, consisting of eight (8) bullard machines, equipped with torit filters for PM and PM<sub>10</sub> control, capacity: 85 parts (3,443 pounds) per hour.

#### A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) use either for a Federally Enforceable State Operating Permit (FESOP).

#### A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted
- by this permit.

- (b) All previous registrations and permits are superseded by this permit.

## GENERAL CONDITIONS

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

This permit does not convey any property rights of any sort, or any exclusive privilege.

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this

permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.13 Emergency Provisions [326 IAC 2-8-12]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967  
Northern Regional Office: 574-245-4870, facsimile 574-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the

Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:



- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326

IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.19 Permit Revision Requirement [326 IAC 2-8-11.1]**

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

<b>Entire Source</b>
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this

permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

**C.6 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.8 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;



- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.10 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

**C.11 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and recordkeeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

**C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:



Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

**C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

**C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Recordkeeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.18 General Recordkeeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or

electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all recordkeeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

**Stratospheric Ozone Protection**

**C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified

by an approved technician certification program pursuant to 40 CFR 82.161.



## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Surface Coating Operations

- (a) One (1) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, capacity: 2,034 brake shoes per hour.
- (b) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, capacity: 923 metal backing plates per hour.
- (c) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with eleven (11) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, capacity: 429 metal brake parts per hour.
- (d) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with four (4) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 12, capacity: 429 metal brake parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [40 CFR 63, Subpart Mmmm]

- (a) The use of any individual HAP, including coatings, dilution solvents, and cleaning solvents from the four (4) surface coating operations, identified as EU-06, EU-07, EU-11, and EU-12 shall not exceed a total of 9.70 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any single HAP from the entire source to less than ten (10) tons per year. Compliance with this limitation shall render the requirements of 326 IAC 2-7 and 40 CFR 63, Subpart Mmmm not applicable.
- (b) The use of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents from the four (4) surface coating operations, identified as EU-06, EU-07, EU-11, and EU-12 shall not exceed a total of 24.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any combination of HAPs from the entire source to less than ten (25) tons per year. Compliance with this limitation shall render the requirements of 326 IAC 2-7 and 40 CFR 63, Subpart Mmmm not applicable.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC from the one (1) metal backing plate dip tank, identified as EU-07 in excess of, three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water delivered to the applicator for air dried or forced warm air dried coatings.

#### D.1.3 Volatile Organic Compounds (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of EU-07 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.



**D.1.4 Particulate Matter (PM) [40 CFR 52, Subpart P]**

Pursuant to T 113-6949-00008, issued on January 19, 1999, and 40 CFR 52 Subpart P 40 CFR 52 Subpart P, the PM from the two (2) spray booths (EU-11 and EU-12) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.1.5 Particulate [326 IAC 6-3-2(d)]**

Pursuant to T 113-6949-00008, issued on January 19, 1999 and 326 IAC 6-3-2(d), particulate from the two (2) spray booths (EU-11 and EU-12) shall be controlled dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU-11 and EU-12 and any control devices.

**Compliance Determination Requirements**

**D.1.7 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the HAPs usage limitations contained in Conditions D.1.1(a) and (b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC content limitation contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.9 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Stacks 11 and 12) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in

accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.1.10 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs usage limits and/or the VOC content limit established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC and HAP content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month;
  - (4) The total HAP usage for each month; and
  - (5) The weight of HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.11 Reporting Requirements**

A quarterly summary of the information to document compliance with Conditions D.1.1(a) and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Grinding System

- (e) One (1) grinding system constructed in 1975, identified as EU-14, equipped with six (6) grinders and a HEPA filtration system, identified as CE-14, for particulate control, exhausting to Stack 14, capacity: 1,800 pounds of friction material per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Particulate Matter (PM) and Particulate Matter Less Than Ten Microns ( $PM_{10}$ ) [326 IAC 2-8-4] [326 IAC 2-2]

The PM and  $PM_{10}$  emission rates from the one (1) grinding system, identified as EU-14, shall not exceed 12.0 pounds per hour each, equivalent to 52.6 tons of PM and  $PM_{10}$  per year. These limits shall limit the potential to emit PM from the entire source to less than two hundred fifty (250) tons per year and the potential to emit  $PM_{10}$  from the entire source to less than one hundred (100) tons per year. Compliance with these limits shall render the requirements of 326 IAC 2-2 and 326 IAC 2-7 not applicable.

#### D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to T 113-6949-00008, issued on January 19, 1999 and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the one (1) grinding system, identified as EU-14, shall not exceed 3.82 pounds per hour when operating at a process weight rate of 0.900 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for one (1) grinding system, identified as EU-14 and its control device.

### Compliance Determination Requirements

#### D.2.4 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the HEPA filters for particulate control shall be in operation and control emissions from the one (1) grinding system, identified as EU-14 at all times that the one (1) grinding system, identified as EU-14 is in operation.

#### D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred eighty (180) days after the issuance of this permit, to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM and  $PM_{10}$  testing on Stack 14 for the one (1) grinding system, identified as EU-14, utilizing methods as approved by the Commissioner. This test shall be

repeated at least once every five (5) years from the date of this valid compliance demonstration.  $PM_{10}$  includes filterable and condensable  $PM_{10}$ . Testing shall be conducted in accordance with Section C- Performance Testing.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **D.2.6 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the HEPA filters. To monitor the performance of the HEPA filters, weekly observations shall be made of the visible emissions from Stack 14 while the one (1) grinding system, identified as EU-14 is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the grinding emissions from the stack and the presence of visible emissions on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in visible emissions, or evidence of visible emissions are observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### **D.2.7 Record Keeping Requirements**

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- (b) To document compliance with Conditions D.2.6(a) and (b), the Permittee shall maintain records of the results of the inspections required under Conditions D.2.6(a) and (b).
- (c) To document compliance with Condition D.2.6(c), the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Insignificant Machining

- (d) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:

One (1) bullard system, consisting of eight (8) bullard machines, equipped with torit filters for PM and PM<sub>10</sub> control, capacity: 85 parts (3,443 pounds) per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to T 113-6949-00008, issued on January 19, 1999 and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the insignificant bullard system, shall not exceed 5.90 pounds per hour when operating at a process weight rate of 1.72 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the insignificant shoe grinders and the insignificant bullard system and any control devices.

### Compliance Determination Requirements

#### D.3.3 Particulate Control

In order to comply with Condition D.3.1, the torit filters for particulate control shall be in operation and control emissions from the insignificant bullard system at all times that the insignificant bullard system is in operation.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific Compliance Monitoring Requirements applicable to these insignificant activities.

### Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

There are no specific Record Keeping and Reporting Requirements applicable to these insignificant activities



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Dexter Axle Company  
Source Address: 500 South Seventh Street, Albion, Indiana 46701  
Mailing Address: P.O. Box 108, Albion, Indiana 46701  
FESOP No.: F 113-17172-00008

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- ? Annual Compliance Certification Letter
- ? Test Result (specify) \_\_\_\_\_
- ? Report (specify) \_\_\_\_\_
- ? Notification (specify) \_\_\_\_\_
- ? Affidavit (specify) \_\_\_\_\_
- ? Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Dexter Axle Company  
Source Address: 500 South Seventh Street, Albion, Indiana 46701  
Mailing Address: P.O. Box 108, Albion, Indiana 46701  
FESOP No.: F 113-17172-00008

**This form consists of 2 pages**

**Page 1 of 2**

- ? This is an emergency as defined in 326 IAC 2-7-1(12)
- ? The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - ? The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM <sub>10</sub> , SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Dexter Axle Company  
Source Address: 500 South Seventh Street, Albion, Indiana 46701  
Mailing Address: P.O. Box 108, Albion, Indiana 46701  
FESOP No.: F 113-17172-00008  
Facilities: Surface Coating Operations (EU-06, EU-07, EU-11 and EU-12)  
Parameter: Individual HAP Usage  
Limit: Total not to exceed 9.70 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

**YEAR:** \_\_\_\_\_

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Dexter Axle Company  
Source Address: 500 South Seventh Street, Albion, Indiana 46701  
Mailing Address: P.O. Box 108, Albion, Indiana 46701  
FESOP No.: F 113-17172-00008  
Facilities: Surface Coating Operations (EU-06, EU-07, EU-11 and EU-12)  
Parameter: Combination of HAPs Usage  
Limit: Total not to exceed 24.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Dexter Axle Company  
Source Address: 500 South Seventh Street, Albion, Indiana 46701  
Mailing Address: P.O. Box 108, Albion, Indiana 46701  
FESOP No.: F 113-17172-00008

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**



<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

**Source Name:** Dexter Axle Company  
**Source Location:** 500 South Seventh Street, Albion, Indiana 46701  
**County:** Noble  
**FESOP:** F 113-17172-00008  
**SIC Code:** 3714  
**Permit Reviewer:** Michael S. Schaffer

On February 9, 2004, the Office of Air Quality (OAQ) had a notice published in the News-Sun, Kendallville, Indiana, stating that Dexter Axle Company had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary motor vehicle parts and accessories manufacturing source with dry filters for particulate control. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Upon further review, the OAQ has decided to make the following change to the FESOP renewal. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

#### **Change:**

The language in Condition C.13 (Monitoring Methods) will be revised as follows:

#### **C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing ~~performed~~ required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Indiana Department of Environmental Management  
Office of Air Quality

Technical Support Document (TSD)  
for a Federally Enforceable State Operating Permit (FESOP)

**Source Background and Description**

<b>Source Name:</b>	<b>Dexter Axle Company</b>
<b>Source Location:</b>	<b>500 South Seventh Street, Albion, Indiana 46701</b>
<b>County:</b>	<b>Noble</b>
<b>SIC Code:</b>	<b>3714</b>
<b>Operation Permit No.:</b>	<b>F 113-17172-00008</b>
<b>Permit Reviewer:</b>	<b>Michael S. Schaffer</b>

The Office of Air Quality (OAQ) has reviewed a FESOP application from Dexter Axle Company relating to the operation of a stationary motor vehicle parts and accessories manufacturing source.

**History**

Dexter Axle Company (formerly Tomkins Industries, Inc. - Dexter Axle Division - Plant 13) was issued a Part 70 Operating Permit (T 113-6949-00008) on January 19, 1999 for the operation of one (1) shoe dip tank, two (2) spray booths, and one (1) asbestos grinding operation. A First Administrative Amendment (AAF 113-10830-00008) was issued on May 20, 1999 to change the source's company name from Tomkins Industries, Inc. - Dexter Axle Division - Plant 13, to Dexter Axle Company. Dexter Axle Company was issued a Second Administrative Amendment (AAF 113-12461-00008) on July 21, 2000 to change the name of the responsible official at this source. Dexter Axle Company was then issued a First Reopening (R 113-13438-00008) on February 9, 2002, to incorporate a state-wide change to Condition B.11 - Annual Compliance Certification.

As part of their operating permit renewal application, received by IDEM, OAQ, on April 16, 2003, Dexter Axle Company has requested to change their operating permit status from a Part 70 Operating Permit to a Federally Enforceable State Operating Permit (FESOP). As a result, the source has elected to limit the source-wide potential to emit of  $PM_{10}$  to less than one (100) tons per year each, the source-wide potential to emit of any individual hazardous air pollutant (HAP) to less than ten (10) tons per year, and the source-wide potential to emit of any combination of HAPs to less than twenty-five (25) tons per year, which is less than the Part 70 thresholds. Furthermore, the unrestricted potential to emit of VOC,  $NO_x$ , CO, and  $SO_2$ , from the entire source will remain at less one hundred (100) tons per year each, which is also below Part 70 thresholds. As a result, IDEM, OAQ agrees that Dexter Axle Company's request to change to a Federally Enforceable State Operating Permit (FESOP) is appropriate.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, capacity: 2,034 brake shoes per hour.

- (b) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with eleven (11) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, capacity: 429 metal brake parts per hour.
- (c) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with four (4) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 12, capacity: 429 metal brake parts per hour.
- (d) One (1) grinding system constructed in 1975, identified as EU-14, equipped with six (6) grinders and a HEPA filtration system, identified as CE-14, for particulate control, exhausting to Stack 14, capacity: 1,800 pounds of friction material per hour.

### **Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted facilities/units:

- (e) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, capacity: 923 metal backing plates per hour.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Source-wide natural gas-fired combustion, rated at 34.62 million British thermal units per hour total, consisting of the following:
  - (1) Three (3) air makeup units, heat input capacity: 5.00 million British thermal units per hour each;
  - (2) Eight (8) heaters / air conditioners, heat input capacity: 0.475 million British thermal units per hour each;
  - (3) Twenty-five (25) natural gas-fired space heaters, heat input capacity: 0.150 million British thermal units per hour each;
  - (4) Three (3) bonders, heat input capacity: 0.800 million British thermal units per hour each;
  - (5) Three (3) parts washers, heat input capacity: 0.650 million British thermal units per hour each;
  - (6) One (1) parts washer, heat input capacity: 0.880 million British thermal units per hour;
  - (7) One (1) parts washer, heat input capacity: 1.80 million British thermal units per hour;
  - (8) One (1) parts washer, heat input capacity: 4.80 million British thermal units per hour; and
  - (9) Three (3) office furnaces, heat input capacity: 0.080 million British thermal units per hour each.

- (b) Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, capacity: 6.00 pounds of welding wire per hour each.
- (c) Paved and unpaved roads and parking lots with public access.
- (d) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:

One (1) bullard system, consisting of eight (8) bullard machines, equipped with torit filters for PM and PM<sub>10</sub> control, capacity: 85 parts (3,443 pounds) per hour.

### Existing Approvals

The source has been operating under the following previous approvals including:

- (a) T 113-6949-00008, issued on January 19, 1999;
- (b) AAF 113-10830-00008, issued on May 20, 1999;
- (c) AAF 113-12461-00008, issued on July 21, 2000; and
- (d) Reopening 113-13438-00008, issued on February 19, 2002.

All terms and conditions from previous approvals issued pursuant to the permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous approvals are superseded by this permit.

The following terms and conditions from previous approvals have been determined to be no longer applicable, and, therefore, are not incorporated into this permit:

T 113-6949-00008, issued on January 19, 1999:

- (a) Condition D.2.1(b): These asbestos grinding operations are subject to the National emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 61.114, Subpart M as follows:
  - (1) Discharge no visible emissions to the outside air from these operation or from any building or structure in which they are conducted or from any other fugitive sources; or
  - (2) Use the methods specified in Part 61.152 to clean emissions from these operations containing particulate asbestos material before they escape to, or are vented to, the outside air.

Reason not incorporated: This source has replaced the asbestos material used at EU-14 with friction material, which does not contain any asbestos. Therefore, the requirements of NESHAP 40 CFR 61.114, Subpart M are no longer applicable.

- (b) Condition D.2.4: Pursuant to 40 CFR 61.114, Subpart M, the HEPA filter for PM control shall be in operation at all times when the asbestos grinding facility is in operation and exhausting

to the outside atmosphere.

Reason not incorporated: The requirements of 40 CFR 61.114, Subpart M are no longer applicable to this source. However, the HEPA filtration system will still be required to operate at all times in this FESOP in order to demonstrate compliance with 326 IAC 2-8-4 for  $PM_{10}$  and 326 IAC 6-3-2 for  $PM_{10}$ .

- (c) Condition D.2.5(d): These following monitoring conditions will satisfy the monitoring requirements of 326 IAC 14-2-1 and 40 CFR 61.114, Subpart M.
- (1) Monitor each potential source of asbestos emissions from any part of the manufacturing facility, including air cleaning devices, process equipment, and buildings housing material processing and handling equipment, at least once each day during daylight hours for visible emissions to the outside air during periods of operation. The monitoring shall be by visual observation of at least 15 seconds duration per source of emissions.
  - (2) Inspect each air cleaning device at least once each week for proper operation and for changes that signal the potential for malfunctions, including, to the maximum extent possible without dismantling other than opening the device, the presence of tears, holes, and abrasions in filter bags and for dust deposits on the clean side of bags. For air cleaning devices that cannot be inspected on a weekly basis according to this paragraph, submit to the Administrator, and revise as necessary, a written maintenance plan to include, at a minimum, the following:
    - (A) Maintenance schedule.
    - (B) Record keeping plan.

Reason not incorporated: The requirements of 40 CFR 61.114, Subpart M are no longer applicable to this source. However, since a pound per hour PM and  $PM_{10}$  emission limits will be required for EU-14 in order to comply with the requirements of 326 IAC 2-8-4, once per shift visible emission notation will be required for EU-14 in this FESOP.

- (d) Condition D.2.6(b): To document compliance with Condition D.2.1(b), the Permittee shall maintain records of the results of visible emission monitoring and air cleaning device inspections and include the following:
- (1) Furnish upon request, and make available at the affected facility during normal business hours for inspection by the Administrator, all records required under this section.
  - (2) Retain a copy of all monitoring and inspection records for at least two (2) years.

Reason not incorporated: Since Condition D.2.1(b) will not be included in the FESOP, the record keeping to comply with Condition D.2.1(b) is no longer necessary. However, since a pound per hour PM and  $PM_{10}$  emission limitation will be placed on EU-14 in order to comply with the requirements of 326 IAC 2-8-4, records of once per shift visible emissions notations will be required in this FESOP.

## Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is also aware that the equipment that was constructed and operated prior to receipt of the proper permit was subject to requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) since the potential to emit of that emission unit was greater than ten (10) tons of a single HAP per year.
- (c) IDEM is reviewing these matters and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

### Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on April 16, 2003. Additional information was received on July 7 and November 24, 2003.

### Emission Calculations

See pages 1 through 7 of 7 in Appendix A of this document for detailed emissions calculations.

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	599
PM <sub>10</sub>	468
SO <sub>2</sub>	0.091
VOC	86.6
CO	12.7
NO <sub>x</sub>	15.2

Note: For the purpose of determining Title V applicability for particulates,  $PM_{10}$ , not PM, is the regulated pollutant in consideration.



HAPs	Potential To Emit (tons/year)
Formaldehyde	0.327
Glycol Ethers	33.5
Benzene	0.0003
Dichlorobenzene	0.0002
Hexane	0.273
Toluene	0.0005
Lead	0.0001
Cadmium	0.0002
Chromium	0.0004
Manganese	0.003
Nickel	0.0003
TOTAL	34.1

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM<sub>10</sub> is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	-
PM <sub>10</sub>	1.00
SO <sub>2</sub>	-
VOC	6.00

Pollutant	Actual Emissions (tons/year)
CO	1.00
NO <sub>x</sub>	3.00
HAP	-

#### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Surface Coating (EU-06, EU-07, EU-11, and EU12)	4.48	4.48	-	85.8	-	-	Single 9.70 Total 24.6
Source-wide Insignificant Natural Gas Combustion	0.288	1.15	0.091	0.834	12.7	15.2	Single 0.273 Total 0.286
Insignificant MIG Welding	1.90	1.90	-	-	-	-	Single 0.003 Total 0.004
Grinding EU-14	52.6	52.6	-	-	-	-	-
Insignificant Bullard System	12.8	1.28	-	-	-	-	-
Unpaved Roads	10.83	4.73	-	-	-	-	-
Total Emissions	82.9	66.1	0.091	86.6	12.7	15.2	Single <10 Total <25

Pursuant to 326 IAC 2-8-4, this source has elected to accept the following limitations:

- (a) The use of any individual HAP, including coatings, dilution solvents, and cleaning solvents from the four (4) surface coating operations, identified as EU-06, EU-07, EU-11, and EU-12 will not exceed a total of 9.70 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any single HAP from the entire source to less than ten (10) tons per year.
- (b) The use of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents from the four (4) surface coating operations, identified as EU-06, EU-07, EU-11, and

EU-12 will not exceed a total of 24.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any combination of HAPs from the entire to less than ten (25) tons per year.

- (c) The PM and PM<sub>10</sub> emission rates from the one (1) grinding system, identified as EU-14, shall not exceed 12.0 pounds per hour each, equivalent to 52.6 tons of PM and PM<sub>10</sub> per year. This limit is required to limit the potential to emit PM from the entire source is less than two hundred fifty (250) tons per year and the potential to emit PM<sub>10</sub> from the entire source is less than one hundred (100) tons per year.

Compliance with the preceding limits will render the requirements of 326 IAC 2-2, 326 IAC 2-7, 326 IAC 2-4.1-1, and 40 CFR 63 Subpart Mmmm not applicable.

### County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Noble County has been designated as attainment or unclassifiable for ozone.
- (b) Noble County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart Mmmm because pursuant 326 IAC 2-8-4, the potential to emit of the entire source is limited to less than ten (10) tons per year of any single HAP and twenty-five (25) tons per year of any combination of HAPs.

### State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

- (a) EU-06, EU-07, EU-11, EU-12, and EU-14 were all constructed prior to August 7, 1977. In

addition, the potential to emit from EU-06, EU-07, EU-11, EU-12, and EU-14 was less than 250 tons of VOC per year and this source is not one of the 28 listed major PSD source categories. Therefore, this source was operating EU-06, EU-07, EU-11, EU-12, and EU-14 as a minor source and a PSD permit pursuant 326 IAC 2-2, was not required.

- (b) The potential to emit VOC from EU-07, constructed in 2000, was less than two hundred fifty (250) tons per year after controls. Therefore, the construction of this emission unit was considered a minor modification to an existing minor PSD source.
- (c) This source is a minor PSD source because pursuant to 326 IAC 2-8-4 (FESOP), the potential to emit VOC will continue to be limited less than one hundred (100) tons per year for the entire source.

#### 326 IAC 2-4.1-1 (New source toxics control)

The entire source except the one (1) dip tank, identified as EU-07, was constructed before July 27, 1997. The potential to emit any single HAP from EU-07 will be limited to less than ten (10) tons per year and the potential to emit any combination of HAPs from EU-07 will be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-4.1-1 will not apply.

However, IDEM, OAQ is aware that from 2000 to the present, EU-07 was subject to the requirements of 326 IAC 2-4.1-1 because this source operated EU-07 with a potential to emit greater than ten (10) tons of a single HAP per year.

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Noble County and the potential to emit VOC and PM<sub>10</sub> is limited less than or one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM<sub>10</sub> shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

- (a) The use of any individual HAP, including coatings, dilution solvents, and cleaning solvents from the four (4) surface coating operations, identified as EU-06, EU-07, EU-11, and EU-12 will not exceed a total of 9.70 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any single HAP from the entire source to less than ten (10) tons per year.
- (b) The use of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents from the four (4) surface coating operations, identified as EU-06, EU-07, EU-11, and EU-12 will not exceed a total of 24.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any combination of HAPs from the entire source to less than ten (25) tons per year.
- (c) The PM and PM<sub>10</sub> emission rates from the one (1) grinding system, identified as EU-14, shall not exceed 12.0 pounds per hour each, equivalent to 52.6 tons of PM and PM<sub>10</sub> per year. This

limit is required to limit the potential to emit PM from the entire source is less than two hundred fifty (250) tons per year and the potential to emit PM<sub>10</sub> from the entire source is less than one hundred (100) tons per year. The HEPA filtration system will be in operation at all times in order to comply with this limit.

#### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### State Rule Applicability - Individual Facilities

##### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to T 113-6949-00008, issued on January 19, 1999 and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the one (1) grinding system, identified as EU-14, shall not exceed 3.82 pounds per hour when operating at a process weight rate of 0.900 tons per hour. This limitation is based upon the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The HEPA filtration system shall be in operation at all times the one (1) grinding system, identified as EU-14, is in operation, in order to comply with this limit.

- (b) Pursuant to T 113-6949-00008, issued on January 19, 1999 and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the insignificant bullard system, shall not exceed 5.90 pounds per hour when operating at a process weight rate of 1.72 tons per hour. This limitation is based upon the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The torit filters shall be in operation at all times the insignificant bullard system is in operation, in order to comply with this limit.

- (c) Pursuant to 326 IAC 6-3-1(b)(9), the three (3) insignificant MIG welders are not subject to the

requirements of 326 IAC 6-3 because the (3) insignificant MIG welders consume less than 525 pounds of wire per day, total.

### 326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

- (a) Pursuant to T 113-6949-00008, issued on January 19, 1999, and 40 CFR 52 Subpart P the particulate matter (PM) from the two (2) spray booths (EU-11 and EU-12) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, particulate from the surface coating operation, identified EU-11 and EU-12, shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) Pursuant to 326 IAC 6-3-1(b)(5), the dip tanks, identified as EU-06 and EU07, are not subject to the requirements of 326 IAC 6-3 because the type of surface coating applicators used in EU-06 and EU-07 are dip coatings.

### 326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) The three (3) surface coating operations, identified as EU-06, EU-11, and EU-12, were all constructed prior to November 1, 1980 in Noble County. Therefore, the requirements of 326 IAC 8-2-9 are not applicable to these emission units.
- (b) The one (1) dip tank, identified as EU-07, constructed in 2000, coats metal under two (2) digit Standard Industrial Classification Code 35 and has a potential to emit greater than fifteen (15) pounds of VOC per day. Therefore, the following requirements are applicable to this emission unit:
- (1) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the one (1) dip tank, identified as EU-07, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

- (2) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and content calculations made, the EU-07 is in compliance with this requirement.

### Testing Requirements

No previous testing was required for this source. However, the following new testing requirements are proposed in order to verify that the PM and PM<sub>10</sub> emissions do not exceed PSD thresholds pursuant to 326 IAC 2-2 and Part 70 thresholds pursuant to 326 IAC 2-8:

Within one hundred eighty (180) days after the issuance of this permit, the Permittee shall perform PM and PM<sub>10</sub> testing on Stack 14 for the one (1) grinding system, identified as EU-14, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C-Performance Testing.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

- (a) The compliance monitoring requirements applicable to EU-11 and EU-12 are as follows:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Stacks 11 and 12) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.



- (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (b) The compliance monitoring requirements applicable to one (1) grinding system, identified as EU-14 are as follows:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the HEPA filters. To monitor the performance of the HEPA filters, weekly observations shall be made of the visible emissions from Stack 14 while the one (1) grinding system, identified as EU-14, is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (2) Monthly inspections shall be performed of the grinding emissions from the stack and the presence of visible emissions on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in visible emissions, or evidence of visible emissions are observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the spray booths and the HEPA filters for the grinding system, must operate properly to ensure compliance with 326 IAC 5-1, 326 IAC 6-3 (Process Operations), and 326 IAC 2-8 (FESOP).

## Conclusion

The operation of this stationary motor vehicle parts and accessories manufacturing source shall be subject to the conditions of the attached proposed FESOP No.: F 113-17172-00008.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Dexter Axle Company**  
**Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701**  
**FESOP: F 113-17172**  
**Plt ID: 113-00008**  
**Reviewer: Michael S. Schaffer**  
**Application Date: April 16, 2003**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
<b>Shoe Dip Tank EU-06</b>																
Shoe Dip	7.09	11.41%	0.00%	11.4%	0.00%	0.00%	0.005	2034	0.81	0.81	8.23	197	36.0	0.00	N/A	100%
Acetone	6.72	100%	100%	0.00%	100%	0.00%	0.0143	2034	N/A	0.00	0.00	0.00	0.00	0.00	N/A	100%
<b>Dip Tank 7</b>																
Backing Plate Dip	8.60	67.10%	55.9%	11.20%	57.2%	28.3%	0.006	923	2.25	0.96	5.3	128	23.4	0.00	3.40	100%

Note that all coatings are "as applied" to the applicators

PM Control Efficiency 0.00%  
**Uncontrolled 13.6 325 59.4 0.00**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
<b>Spray Booth EU-11</b>																
Black (water based)	11.29	53.80%	44.36%	9.44%	60.12%	37.14%	0.0055	429	2.67	1.07	2.51	60.4	11.0	13.5	2.87	75.0%
Tan (water based)	12.50	41.50%	37.77%	3.73%	0.00%	42.0%	0.0065	429	0.466	0.466	1.30	31.2	5.69	22.3	1.11	75.0%
Red Enamel (water based)	12.00	42.50%	38.33%	4.17%	0.00%	43.2%	0.0065	429	0.500	0.500	1.40	33.5	6.11	21.1	1.16	75.0%
Red Oxide (water based)	12.30	43.00%	39.02%	3.98%	0.00%	41.0%	0.0085	429	0.490	0.490	1.79	42.8	7.82	28.0	1.19	75.0%
Blue Lacquer (water based)	8.42	86.43%	60.4%	26.0%	64.45%	22.7%	0.0032	429	6.17	2.19	3.01	72.2	13.2	1.72	9.66	75.0%
<b>Spray Booth EU-12</b>																
Black Enamel (water based)	11.29	53.80%	44.36%	9.44%	60.12%	37.14%	0.0055	429	2.67	1.07	2.51	60.4	11.0	13.5	2.87	75.0%
Tan (water based)	12.50	41.50%	37.77%	3.73%	0.00%	42.0%	0.0065	429	0.466	0.466	1.30	31.2	5.69	22.3	1.11	75.0%
Red Enamel (water based)	12.00	42.50%	38.33%	4.17%	0.00%	43.2%	0.0065	429	0.500	0.500	1.40	33.5	6.11	21.1	1.16	75.0%
Red Oxide (water based)	12.30	43.00%	39.02%	3.98%	0.00%	41.0%	0.0085	429	0.490	0.490	1.79	42.8	7.82	28.0	1.19	75.0%
Blue Lacquer (water based)	8.42	86.43%	60.4%	26.0%	64.45%	22.7%	0.0032	429	6.17	2.19	3.01	72.2	13.2	1.72	9.66	75.0%

Note that all coatings are "as applied" to the applicators

PM Control Efficiency 92.0%  
**Uncontrolled 20.0 480 26.4 56.0**  
**Controlled 20.0 480 26.4 4.48**

**Potential to Emit Add worst case coating to all solvents**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

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**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, Indiana 46701  
**FESOP:** F 113-17172  
**Plt ID:** 113-00008  
**Reviewer:** Michael S. Schaffer  
**Application Date:** April 16, 2003

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % Glycol Ethers	Formaldehyde Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)
<b>Shoe Dip Tank EU-06</b>							
Shoe Dip	7.09	0.005	2034	0.100%	0.00%	0.316	0.00
<b>Dip Tank 7</b>							
Backing Plate Dip	8.60	0.006	923	0.00%	6.63%	0.00	13.8
<b>Spray Booth EU-11</b>							
Black (water based) W44250	11.29	0.0055	429	0.00%	5.00%	0.00	5.83
Tan (water based) W44090	12.50	0.0065	429	0.00%	5.00%	0.00	7.63
Red Enamel (water based) 3-0824	12.00	0.0065	429	0.00%	1.30%	0.00	1.91
Red Oxide (water based) W44092	12.30	0.0085	429	0.00%	5.00%	0.00	9.82
Blue Lacquer 5025	8.41	0.0032	429	0.00%	6.56%	0.00	3.32
<b>Spray Booth EU-12</b>							
Black (water based) W44250	11.29	0.0055	429	0.00%	5.00%	0.00	5.83
Tan (water based)	12.50	0.0065	429	0.00%	5.00%	0.00	7.63
Red Enamel (water based)	12.00	0.0065	429	0.00%	1.30%	0.00	1.91
Red Oxide (water based)	12.30	0.0085	429	0.00%	5.00%	0.00	9.82
Blue Lacquer	8.41	0.0032	429	0.00%	6.56%	0.00	3.32
						<b>0.316</b>	<b>33.5</b>
						<b>Overall Total</b>	<b>33.8</b>

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

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**Company Name:** Dexter Axle Company  
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Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

34.62

303.27

Source-wide Insignificant Natural Gas Combustion

Three (3) air make up units @ 5.00 mmBTU/hr, each  
Eight (8) Heaters / Air Conditioners @ 0.475 mmBTU/hr  
Twenty-five (25) Space Heaters @ 0.150 mmBTU/hr, each  
Three (3) bonders @ 0.800 mmBTU/hr, each  
Three (3) parts washers @ 0.650 mmBTU/hr, each  
One (1) parts washer @ 0.880 mmBTU/hr  
One (1) parts washer @ 1.80 mmBtu/hr  
One (1) parts washer @ 4.80 mmBtu/hr  
Three (3) office furnaces @ 0.080 mmBtu/hr, each

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.288	1.15	0.091	15.2	0.834	12.7

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
HAPs Emissions**

**Page 4 of 7 TSD App A**

**Company Name:** Dexter Axle Company  
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**HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.0003	0.0002	0.011	0.273	0.0005

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.001	Chromium 0.001	Manganese 0.0004	Nickel 0.002	Total HAPs
Potential Emission in tons/yr	0.0001	0.0002	0.0002	0.00006	0.0003	0.286

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Source-wide Insignificant Natural Gas Combustion

Three (3) air make up units @ 5.00 mmBTU/hr, each  
 Eight (8) Heaters / Air Conditioners @ 0.475 mmBTU/hr  
 Twenty-five (25) Space Heaters @ 0.150 mmBTU/hr, each  
 Three (3) bonders @ 0.800 mmBTU/hr, each  
 Three (3) parts washers @ 0.650 mmBTU/hr, each  
 One (1) parts washer @ 0.880 mmBTU/hr  
 One (1) parts washer @ 1.80 mmBtu/hr  
 One (1) parts washer @ 4.80 mmBtu/hr  
 Three (3) office furnaces @ 0.080 mmBtu/hr, each

**Company Name:** Dexter Axle Company  
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PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(L50)	3	6		0.0241	0.000034		0.00001	0.434	0.0006	0.000	0.0002	0.001
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								0.434	0.0006	0.000	0.0002	0.001
Potential Emissions lbs/day								10.4	0.015	0.00	0.004	0.019
Potential Emissions tons/year								1.90	0.0027	0.000	0.0008	0.004

## METHODOLOGY

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

**Appendix A: Emissions Calculations  
Particulate Emissions From Ginding and Machining**

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**Company Name:** Dexter Axle Company  
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**FESOP:** F 113-17172  
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**Application Date:** April 16, 2003

**Shoe Grinding Systems**

Emission Unit	Capacity (lbs/hr)	Percentage (%) of Capacity Collected	Potential to Emit PM and PM-10 Before Controls (lbs/hr)	Potential to Emit PM and PM-10 Before Controls (tons/yr)	Control Efficiency Percentage (%)	Potential to Emit PM and PM-10 After Controls (tons/yr)
<b>EU-14</b>	1800	4.96%	89.28	391	99.9997%	0.0012

Note that the grinding systems are controlled by a HEPA Filtration System

**Methodology**

The Percentage Capacity Collected is based on the amount of asbestos that was projected to be collected in T 113-6949-00008, issued on January 19, 1999

Potential to Emit PM and PM-10 Before Controls (lbs/hr) = Capacity (lbs/hr) \* Percentage (%) Capacity Collected

Potential to Emit PM and PM-10 Before Controls (tons/yr) = Potential to Emit PM and PM-10 (lbs/hr) \* (1 ton/2,000 lbs) \* (8,760 hrs/yr)

Potential to Emit PM and PM-10 After Controls (tons/yr) = Potential to Emit PM and PM-10 Before Controls (tons/yr) \* (1 - Control Efficiency %)

Asbestos has been replaced with Friction Material at this Emission Unit.

Friction Material does not contain any HAPs

**Insignificant Machining**

Emission Unit	Capacity (parts/hr)	Weight of Part (lbs/part)	Weight Rate (lbs/hr)	Weight Rate (tons/hr)	PM Emission Factor (lbs/ton)	PM-10 Emission Factor (lbs/ton)	Potential to Emit PM Before Controls (lbs/hr)	Potential to Emit PM-10 Before Controls (lbs/hr)
<b>Bullard System</b>	85	40.51	3443	1.72	17	1.7	29.27	2.93

Potential to Emit PM Before Controls (tons/yr)	Potential to Emit PM-10 Before Controls (tons/yr)	Overall Control Efficiency Percentage (%)	Potential to Emit PM After Controls (tons/yr)	Potential to Emit PM 10 After Controls (tons/yr)
128	12.8	90.00%	12.8	1.28

**Methodology**

Weight Rate (tons/hr) = Capacity \* Weight of Part (lbs/part) = Weight Rate (lbs/hr) \* (1 ton/2000lbs)

Potential to Emit PM or PM10 Before Controls (tons/yr) = Weight Rate (tons/hr) \* PM or PM-10 Emission Factor (lbs/ton) \* (2000lbs/ton)

Potential to Emit PM and PM-10 After Controls (tons/yr) = Potential to Emit PM and PM-10 Before Controls (tons/yr) \* (1 - Control Efficiency %)

PM and PM-10 Emission Factors are from FIRES 6.23 SCC# 3-04-003-40 For Grinding and Machining of Gray Iron

# Appendix A: Emission Calculations

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**Company Name:** Dexter Axle Company  
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**FESOP:** F 113-17172  
**Plt ID:** 113-00008  
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\*\* unpaved roads \*\*

Vehicle Type	Trips Per Hour	Miles of Unpaved Road Per Roundtrip	Miles Per Hour	Average Weight of Vehicle in Tons	Number of Ton Trips Per Hour
Semis w/ Tractor Trailer	3.00	0.350	1.05	30.0	90.00
Forklift	1.00	0.100	0.100	4.50	4.50

Total: 4.00      Total: 1.150      Total: 94.5

Weighted Average Roundtrip: 0.288 Miles      Weighted Average Weight: 23.63 Tons

## Methodology

Trips Per Hour x Miles of Unpaved Road Per Roundtrip = Miles Per Hour  
 Trips Per Hour x Weight of Vehicle in Tons = Number of Ton Trips Per Hour  
 Weighted Average Roundtrip = Total Miles Per Hour / Total Trips Per Hour  
 Weighted Average Weight = Total Ton Trips Per Hour / Total Trips Per Hour

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads based on 8760 hours of use and AP-42, Ch 11.2.1, a weighted average miles per roundtrip and weighted average tons per vehicle .

## Potential Unpaved Roads Emissions

4.0 maximum trips/hr x  
 0.288 average miles/roundtrip x  
 8760 hrs/yr =

10091.5 miles per year

### For PM

### For PM-10

$$Ef = \{k^*[(s/12)^{0.8}]^*[(W/3)^b]/[(Mdry/0.2)^c]\}^*[(365-p)/365]$$

where k = 1.88 lb/mile  
 s = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)  
 b = 4.8 mean % silt content of unpaved roads  
 c = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)  
 W = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)  
 W = 23.63 tons average vehicle weight  
 Mdry = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)  
 p = 125 number of days with at least 0.254mm of precipitation (See Figure 13.2.2-1)

Wet Supression Efficiency 50.00%

8.87 lb/mi x 2000 lb/ton 10091.52 mi/yr = PM before controls 44.74 tons/yr PM after controls 22.37 tons/yr  
 1.88 lb/mi x 2000 lb/ton 10091.52 mi/yr = PM-10 before controls 9.46 tons/yr PM-10 after controls 4.73 tons/yr